

FILED	RECEIVED	LODGED COPY
OCT 24 2023		
CLERK U.S. DISTRICT COURT DISTRICT OF ARIZONA		
BY <input checked="" type="checkbox"/> DEPUTY		

UNITED STATES DISTRICT COURT

for the
District of Arizona tucson Division

Tony Clarence Memory

Case No. CV-23-00481-TUC-LCK

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

EmployBridge DBA Prologistix

Jury Trial: (check one) Yes No

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT FOR EMPLOYMENT DISCRIMINATION

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Tony Clarence Memory
Street Address	3130 W rock Hill Rd APT 41
City and County	Tucson , Pima
State and Zip Code	AZ 85745
Telephone Number	813-585-1485
E-mail Address	tonycmemory@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. The discriminatory conduct of which I complain in this action includes (check all that apply):

- | | |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | Failure to hire me. |
| <input type="checkbox"/> | Termination of my employment. |
| <input type="checkbox"/> | Failure to promote me. |
| <input type="checkbox"/> | Failure to accommodate my disability. |
| <input checked="" type="checkbox"/> | Unequal terms and conditions of my employment. |
| <input checked="" type="checkbox"/> | Retaliation. |
| <input checked="" type="checkbox"/> | Other acts (specify): Retaliation Sense 2016 to Present over a 2016 eeoc complaint |

(Note: Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court under the federal employment discrimination statutes.)

**B. It is my best recollection that the alleged discriminatory acts occurred on date(s)
2016, 2017, 2018, 2020 in Florida, 2022. However in 2022 i was still blocked also in Arizona Area****C. I believe that defendant(s) (check one):**

- | | |
|-------------------------------------|--|
| <input checked="" type="checkbox"/> | is/are still committing these acts against me. |
| <input type="checkbox"/> | is/are not still committing these acts against me. |

D. Defendant(s) discriminated against me based on my (check all that apply and explain):

- | | | |
|-------------------------------------|---|--|
| <input checked="" type="checkbox"/> | race | African America |
| <input checked="" type="checkbox"/> | color | Black |
| <input type="checkbox"/> | gender/sex | _____ |
| <input type="checkbox"/> | religion | _____ |
| <input type="checkbox"/> | national origin | _____ |
| <input type="checkbox"/> | age (year of birth) | (only when asserting a claim of age discrimination.) |
| <input checked="" type="checkbox"/> | disability or perceived disability (specify disability) | Stuttering, Slow learning, Slight mental issues. |

E. The facts of my case are as follows. Attach additional pages if needed.

After a 2016 Racist/biased encounter at a Tampa FL office branch against brown and black people. I filed a complaint with the EEOC. eeoc didnt find anything but Mandy Johnson and Ashley Boulle were later Terminated in 2017 after i tipped off Leyda Guzman a hispanic employee to watch her. Sense then This company Bitter, blocked me in Florida from 2016-2023 and Arizona from 2021 to Present WITHOUT A LISTED REASON. I had some small angry words with that office during the complaint process like "ASS, DAMN, FUCK, "DEMON GIRL" but never vile or derogatory like My genitals or hers or C-word against whites. or death threats. just protesting words. I was very respectful to the corporate offices just not to Mandy. regardless they countinued to block me if i ever wanted to work a suitable job. Previously they had a "listed" reason. then after 2017 they left me blocked "WITHOUT A RFASON".

(Note: As additional support for the facts of your claim, you may attach to this complaint a copy of your charge filed with the Equal Employment Opportunity Commission, or the charge filed with the relevant state or city human rights division.)

IV. Exhaustion of Federal Administrative Remedies

- A. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission or my Equal Employment Opportunity counselor regarding the defendant's alleged discriminatory conduct on (date)
11/2/2022
-

- B. The Equal Employment Opportunity Commission (check one):

has not issued a Notice of Right to Sue letter.

issued a Notice of Right to Sue letter, which I received on (date) 07/31/2023.

(Note: Attach a copy of the Notice of Right to Sue letter from the Equal Employment Opportunity Commission to this complaint.)

- C. Only litigants alleging age discrimination must answer this question.

Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding the defendant's alleged discriminatory conduct (check one):

60 days or more have elapsed.

less than 60 days have elapsed.

V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Pro Se 7 (Rev. 12/16) Complaint for Employment Discrimination

At this time I DEMAND from EMPLOYBRIDGE "\$300,000" or Settlement ADR and/or court UNBLOCK ME. Please stop blocking me because Mandy Got Fired. and you were embarrassed by your LIES and DECEIT to eecoc in 2016. This Company nets worth is \$400 billion and they own half of the Temp work contracts and continue to grow. Blocking me for life will prevent me from ever getting jobs in my 40s or 60s, and i have a lot of life left in my body. The Company also keeps refusing to use her legal name. only calling her a former "TEAM MEMBER". NO! say her name, MANDY JOHNSON!!! No threats were ever made to her life. just PG13 name calling, and I WAS 100% right all along. Prologistix, Ashley, Laura, Lydia, Michelle NO LONGER SPEAK TO HER this day!!! Because They are on record saying they are blocking me over 2016 " TEAM MEMBER". Then i have the legal right to SUE THEM over that. and its NOT time barred. As its a retaliation after the fact case.

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 10-24-2023

Signature of Plaintiff



Printed Name of Plaintiff

Tony Clarence Memory

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address